

**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the
Transport of Dangerous Goods

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Item 6 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON
THE TRANSPORT OF DANGEROUS GOODS**

Comments on ST/SG/AC.10/C.3/2007/7

Provisions concerning training

Submitted by the International Vessel Operators Hazardous Materials Association, Inc. (VOHMA)

1. One of the primary missions of VOHMA is to provide regulatory compliance training to employees of vessel operators as well as employees of our intermodal partners and shippers throughout the world. We have conducted numerous training sessions in Asia, North and South America and the Caribbean on the IMDG Code and the regulations applicable to connecting modes including the unique national requirements of States. VOHMA agrees with the expert from Sweden that employees engaged in the transport of dangerous goods must receive the mandatory training required at Chapter 1.3 and provisions must be written into the Model Regulations to ensure that the intent of training provisions are achieved.
2. VOHMA believes that one of the most effective means of training employees is through actual “on the job” type training whereby a trained and qualified practitioner provides “hands-on” instruction and oversight to ensure that the trainee learns the proper methods to prepare, handle, load, or transport dangerous goods. In addition to teaching practical application of the regulations, the trainer may also provide direction on the safety policies and procedures specified by the employer. Classroom instruction on the applicable codes may be provided by the employer or by a third party provider and, for optimum results usually focus on the hazard classes and products to be actually encountered by the employee and are based on the functions for which they are employed.
3. In the steam-ship industry, the majority of our crew members receive training on recognizing hazardous materials, following the detailed stowage plan for the vessel, and emergency response procedures applicable to an incident or release on-board. It is unnecessary to provide training on the scientific aspects of classification or on package testing criteria that might be more beneficial for employees of a shipper. Therefore it would

be difficult to require a person to be fully trained in the contents of the dangerous goods requirements commensurate with their responsibilities for the position of their employment prior to being actually employed in any given position.

4. VOHMA suggests that a specific time period be allotted for training and would request that Sweden consider revising their proposal in the following manner.

The current text at 1.3.1 through 1.3.3 would remain as currently provided in Chapter 1.3.

Amend 1.3.4 No person shall be engaged in a position involving dangerous goods transport without being provided with, or verified as having appropriate training required by this Chapter.

1.3.4.1 The appropriate training must be provided within 90 days of employment and during that training period the person must perform any work subject to this code only while under the direct supervision of a trained and qualified person.

1.3.4.2 The training required by 1.3.2 shall be provided in accordance with 1.3.4.1 or verified upon employment in a position involving dangerous goods transport and shall be periodically supplemented with retraining as deemed appropriate by the competent authority.
